United States Department of Agriculture
Food Safety And Inspection Service
Technical Service Center
Suite 300, Landmark Center
1299 Farnam Street
Omaha. NE 68102

AUDIT REPORT FOR AUSTRALIA

OCTOBER 16 THROUGH NOVEMBER 3, 2000

July 2, 2001

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Australia's meat inspection system from October 16 through November 3, 2000. Nine of the ninety-nine establishments certified to export meat to the United States were audited. Eight of these were slaughter establishments; the other one was conducting processing operations.

The last audit of the Australian meat inspection system was conducted in May 1999. Twelve establishments were audited: nine were acceptable (est. 04, 07, 294, 239, 235, 558, 716, 648, 1013), and three were evaluated as acceptable/re-review (est. 517, 688, 1471). The concerns from that audit were:

- Zero tolerance defects were observed in the boning room and/or the carcass coolers of five plants (est. 235, 716, 648, 688, and 239).
- Condensation was observed above exposed product and/or above exposed product trafficways (est. 04 and 517).
- Rodent activity was noted inside 5 establishments (est. 558, 1013, 517, 07, and 688).
- Plastic strip doors were in use in exposed product areas in most establishments.

During this new audit, two of the establishments recommended for re-review, were included in the new itinerary, (est. 517 and 688); the other (Est.1471) was not certified at the time. These deficiencies were addressed in this year's audit and were found to be corrected.

Any meat or meat product produced in a U.S.-certified establishment is eligible to be exported to the United States.

During January 1 to October 31, 2000, Australian establishments exported nearly 619 million pounds of beef and slightly more than 82 million pounds of mutton, lamb and goat to the U.S. Port-of-entry (POE) rejections were for processing defects (0.02% of the total), miscellaneous defects (0.007%), contamination (0.05%), pathological defects (0.02%), and transportation damage and missing shipping marks (0.17% combined).

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Australian national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat

inspection headquarters facilities and at other sites. Establishments for on site audit were selected from a group of 25 drawn from the total list of 99 U.S.-certified establishments. Nine were selected for on site visits and the remainder of the 25 were chosen for centralized records audits. This selection was based on volume of product exported, the volume of border rejections and the reason thereof, previous problems and managerial units. The third was conducted by on-site visits to establishments. The fourth was a visit to two laboratories, one performing analytical testing of field samples for the national residue testing program, and the other culturing field samples for the presence of microbiological contamination with *Salmonella*.

Australia's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the generic *Escherichia coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials (this was the case with one establishment—see below).

RESULTS AND DISCUSSION

Summary

Based on the performance of the individual establishments, Australia's "In-Plant Inspection System Performance" was evaluated as In-Plant System Controls In Place.

Effective inspection system controls were found to be in place in eight of the establishments audited; one establishment, 533, was found to be unacceptable. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli,* are discussed later in this report.

The last audit of the Australian meat inspection system was conducted in May 1999. Twelve establishments were audited: nine were acceptable (est. 04, 07, 294, 239, 235, 558, 716, 648, 1013), and three were evaluated as acceptable/re-review (est. 517, 688, 1471). The concerns from that audit were: zero tolerance defects were observed in the boning room and/or the carcass coolers of five plants (Est. 235, 716, 648, 688, and 239); condensation was observed above exposed product and/or above exposed product trafficways (Est. 04 and 517); rodent activity was noted inside 5 establishments (Est. 558, 1013, 517, 07, and 688); plastic strip doors were in use in exposed product areas in most establishments. During this new audit, the auditor determined that these deficiencies were found to be corrected.

Entrance Meeting

On October 16, an entrance meeting was held in the Canberra offices of the Australian Quarantine and Inspection Service (AQIS), and was attended by Dr. Peter Miller, National Operations Manager; Dr. Jonathan Webber, Manager National Residue Program; Mr. Steven Bailey, National Manager Program Services; Mr. Neville Spencer, Executive Officer; Dr. Kiran Johar, Principal Veterinary Officer; Mr. Paul Smith, Meat Inspection Division Branch; Mr. Stephen Richardson, Technical Services Branch; Dr. Charles Bosgra, Area Technical Manager Coordinator (Canberra); Dr. Peter McGregor, Senior Area Technical Manager (Victoria); Dr. Roger Turner, Senior Area Technical Manager (New South Wales); Dr. Steven Tidswell, Area Technical Manager (Canberra); and Dr. M. Douglas Parks, International Audit Staff Officer, USDA FSIS.

Topics of discussion included the following:

1. The sampling rate of sheep for generic *E. coli* and *Salmonella* testing.

2. The size of the sampling site on bobby calves.

3. The discarding of small stock heads before post mortem inspection.

4. Annual assessment of HACCP program.

5. The equivalence of HACCP and the Meat Hygiene Assessment (MHA) scheme.

6. Systems Audits.

7. Information on rejected imports at U.S. Import Stations.

8. The monitoring of Good Manufacturing Practices (GMP).

Headquarters Audit

There have been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Australia's inspection system in May 1999.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the headquarters of the inspection service, at a district or regional office or other convenient site. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.

- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels, and animal raising claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

No concerns arose as a result the examination of these documents.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Australia as eligible to export meat products to the United States were full-time AQIS employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

Ninety-nine establishments were certified to export meat products to the United States at the time this audit was conducted. Nine establishments were visited for on-site audits. In eight of the nine establishments visited, both AQIS inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information about the following risk areas was also collected:

1. Government oversight of accredited, approved, and private laboratories.
2. Intra-laboratory quality assurance procedures, including sample handling.

3. Methodology.

The Chemical Residue Laboratory in Brisbane was audited on October 31, 2000. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum

detection levels, recovery frequency, percent recoveries, and corrective actions. The methods used for the analyses were acceptable. No compositing of samples was done.

The check sample program did meet FSIS requirements. Check samples for each analyst are on a monthly basis and samples between laboratories are run every three months. Australia's microbiological testing for *Salmonella* was being performed in private laboratories. One of these, the Symbio Alliance Laboratory in Brisbane was audited. The auditor determined that the system met the criteria established for the use of private laboratories under FSIS's Pathogen Reduction/HACCP rule. These criteria are:

1. The laboratories have been accredited/approved by the government, accredited by third party accrediting organization with oversight by the government, or a government contract laboratory.
2. The laboratories have properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses are being reported to the government or simultaneously to the government and establishment.

Establishment Operations by Establishment Number

The following operations were being conducted in the nine establishments:

Beef and sheep slaughter and boning – five establishments (195, 533, 640, 688, and 3085)
Beef slaughter and boning – one establishment (517)
Beef and sheep processing only – one establishment (297)
Sheep slaughter and boning – two establishments (2309 and 572)

SANITATION CONTROLS

Based on the on-site audits of establishments, Australia's inspection system had controls in place for basic establishment facilities, condition of facilities, product protection and handling and establishment sanitation program.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements, with only occasional minor variations except as listed below and in establishment 533. In this establishment critical deficiencies were noted on carcasses after the pre-boning trim, in the boning room and on product after vacuum packaging. One general problem seen was that there was no effective system in place for detection and removal of urine spillage on sheep carcasses during the dressing procedure.

Cross-Contamination

1. A carcass trim operator was observed not sanitizing hands and equipment between carcasses for pathology removals (Est. 533).
2. Poison baits for rodent control in production related areas (Est. 517), no monitoring devices for rodents inside the plant (Est. 297 and 572).
3. Feces found on product after pre-trim station (Est. 195, 533 and 3085).
4. Adrenal glands found on sheep carcasses in the cooler and in the boning room (Est. 572 and 640).
5. Condensate was observed above exposed product (Est. 688 and 3085).
6. Product conveyor belt was not constructed for cleaning underneath (Est. 2309).
7. The correct procedure for re-conditioning of dropped carcasses was not being followed (Est. 533 and 688).
8. No effective procedure for detection and removal of urine spillage on sheep carcasses (Est. 533, 572, 2309, and 3085).

Dressing procedures of carcasses in the slaughter department need more attention to detail and correction (see above 3, 4, 7 and 8). The establishment and inspection management rely heavily on "Work Instructions" to be in place. More monitoring and corrections of these Work Instructions is needed. The Work Instructions are the directions given to each job position holder, telling him/her how to accomplish the duties associated with their position. These are verbally given and a written sheet of the instructions is usually posted near the work position.

ANIMAL DISEASE CONTROLS

Australia's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

RESIDUE CONTROLS

Australia's National Residue Testing Plan for 2000 was being followed, and was on schedule. The Australian inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

The Australian inspection system had controls in place to ensure adequate operations in humane handling, slaughter, ingredients, formulations and packaging materials.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found to meet the basic FSIS regulatory requirements, with the exception of establishment 297. In this establishment's HACCP hazard analysis and plan, the temperature of the incoming carcasses was not addressed (see attachment B questions 3 & 6).

Testing for Generic *E. coli*

Australia has adopted the FSIS regulatory requirements for *E. coli* testing.

Eight of the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C). Two problems that exist in many establishments (attachment C questions 3 & 7) are the location of sampling in the plant is not written in the testing plan and the carcass selection was not completely random.

The *E. coli* testing programs were found to meet the basic FSIS regulatory requirements. Australia has requested an equivalence determination from FSIS regarding the generic *E. coli* sampling requirements for minor species, e.g., sheep and goats.

Additionally, establishments had adequate controls in place to prevent meat products intended for Australian domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

The AQIS inspection system controls [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other counties for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and

properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

Eight of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

Australia has adopted the FSIS regulatory requirements for *Salmonella* testing.

The *Salmonella* testing programs were found to meet the basic FSIS regulatory requirements.

Species Verification Testing

At the time of this audit, Australia was not exempt from the species verification testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements.

MONTHLY REVIEWS

These reviews were being performed by the Australian equivalent of Circuit Supervisors. They are titled Area Technical Managers (ATM). All were veterinarians with several years of experience.

The internal review program was not applied equally to both export and non-export establishments. Domestic establishments are not mandatoraly reviewed by Senior ATM's every month. Internal review visits were not always announced in advance, and were conducted, at times by individuals and at other times by a team of reviewers, at least once monthly, and sometimes more often if indicated. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central AQIS offices in Canberra, and were routinely maintained on file for a minimum of three years.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility and be reinstated, a group is empowered to conduct an in-depth review. This is called a "Cross Review", and the results are reported to Headquarters Managers for evaluation; they formulate a plan for corrective actions and preventive measures.

After observing the internal reviewers' activities in the field, the auditor was confident in their professionalism, thoroughness, and knowledge of U.S. requirements, and in the effectiveness of Australia's internal review program as a whole.

Enforcement Activities

Set out below is information obtained through AQIS Compliance & Investigation, Compliance Information System (CIS). AQIS Compliance & Investigation(C&I) seeks to warrant the integrity of AQIS export and quarantine systems by delivering an investigation and monitoring service designed to encourage industry compliance with the legislative requirements for the movement of goods into or out of Australia. The following statistics deal with the meat related issues during the year 2000.

Founded prosecutions for meat related issues—4

These were in relation to issues prior to the animals being processed under EU requirements. Fines imposed by the courts ranged from $300 to $500.

Prosecutions pending---1

This is a forgery matter relating to trade description. The product was described in a manner that did not meet the requirements of the importing country. There is no issue over the integrity of the product in terms of food safety.

Letters of warning issued---8

These letters were issued for matters including the types of vehicle carrying product, issues between AQIS staff and plant management, and minor hygiene matters.

Matters referred to external agencies---8

These matters were for issues dealt with by State Departments/Jurisdictions, e.g. theft related issues (Police), animal welfare (RSPCA), and matters under the jurisdiction of State Departments of Agriculture.

Investigations conducted and matter resolved through discussions with management---23

These were matters that included such issues as seals being accidentally broken, door security, animal welfare, where Compliance Investigators negotiated directly with plant management.

EXIT MEETING

An exit meeting was conducted in Canberra on November 3, 2000. The participants were: Mr. Brian MacDonald, Acting Executive Director; Dr. Peter Miller, Acting National Manager Technical Services, Dr. Jack Haslam, Manager Meat and Food Policy; Dr. Jonathan Webber, Manager National Residue Program; Mr. Barry Shirley, Compliance and Investigations; Mr. Russ Smith, Compliance and Investigations; Dr. Kiran Johar, Principal Veterinary Officer; Mr. Neville Spencer, Executive Officer; Mr. Bob Biddle, General Manager Food Policy; Mr. Paul Smith, Meat Inspection; Mr. Martin Holmes, Meat Inspection and Food Service; Dr. Charles Bosgra, Area Technical Manager Coordinator; Dr. Albert Cobb, Senior Area Technical Manager; Dr. Steve Tidswell, Area Technical Manager (Canberra); Dr. Peter McGregor, Senior Area Technical Manager; (Victoria); Dr. Roger Turner, Senior Area Technical Manager (New South Wales); and Dr. M. Douglas Parks, International Audit Staff Officer, USDA FSIS.

The following topics were discussed:

1. Establishment 533 delistment and the paperwork for this procedure and the latest methodology for relistment. The Australian inspection officials understand this procedure and will comply.

2. Rodent baits in production or production related areas. The response was Australian inspection officials stated that there will be immediate removal and replacement with monitoring devices.
3. Zero tolerances for feces, ingesta, milk and urine with emphasis on feces and urine. Australian inspection officials will form a managerial group to solve this problem immediately.
4. Dropped carcass procedures were not being conducted as written. Monitoring will be followed to assure correct response.
5. Dressing procedures for slaughter establishments need improvement. Meat Hygiene Assessment System will require this to improve.
6. No post mortem inspection on the heads of small stock. Their response was that it was submitted to International Policy Staff, FSIS and they were awaiting a response from them.
7. The rate of sampling for generic *E. coli* testing for sheep. They responded that it had been submitted to International Policy Staff, FSIS and they were awaiting a response.
9. Lateral retropharyngeal lymph nodes of beef heads are not being incised on routine post mortem procedures. The Australian inspection officials said that this has been referred to International Policy Staff, FSIS and they are awaiting a reply.

CONCLUSION

The inspection system of Australia was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. The major problem observed was the lack of policy or procedure to address urine spillage on sheep carcasses during the slaughter process. Nine establishments were audited: eight were acceptable, one was evaluated as unacceptable. The deficiencies encountered during the on-site establishment audits, in those establishments which were found to be acceptable, were adequately addressed to the auditor's satisfaction.

Dr. M. Douglas Parks
International Audit Staff Officer

(signed) *Dr. M. Douglas Parks*

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for generic *E. coli* testing
D. Data collection instrument for *Salmonella* testing
E. Laboratory audit form
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the Draft Final Audit Report (when it becomes available)
H. FSIS Response(s) to Foreign Country Comments (when it becomes available)

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Fre-quency addressed	6. Respons-ible indiv. identified	7. Docu-mentation done daily	8. Dated and signed
2309	√	√	√	√	√	√	√	√
517	√	√	√	√	√	√	√	no
688	√	√	√	√	√	√	√	√
3085	√	√	√	√	√	√	√	√
297	√	√	√	√	√	√	√	√
533	√	√	√	√	√	√	√	√
572	√	√	no	√	√	√	√	√
640	√	√	√	√	√	√	√	√
195	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

217	√	√	√	√	√	√	√	√
790	√	√	√	√	√	√	no	√
180	√	√	√	√	√	√	√	√
1614	√	√	√	√	√	√	√	√
1027	√	√	√	no	√	√	√	√
2291	√	√	√	√	√	√	√	√
101	√	√	√	√	√	√	√	√
04	√	√	√	√	√	√	√	√
239	√	√	√	√	√	√	√	√
1983	√	√	√	√	√	√	√	√
521	√	√	√	√	√	√	√	√
612	√	√	√	√	√	√	√	√
952	√	√	√	√	√	√	√	√
39	√	√	√	√	√	√	√	√
15	√	√	√	√	√	√	√	√

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. as required to have developed and implemented a Hazard Analysis Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis.
3. The analysis includes food safety hazards likely to occur.
4. The analysis includes the intended use of or the consumers of the finished product(s).
5. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
6. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
7. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
10. The plan describes corrective actions taken when a critical limit is exceeded.
11. The HACCP plan was validated using multiple monitoring results.
10. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
11. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
12. The HACCP plan is dated and signed by a responsible establishment official.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. All hazards identified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. actions are described	9. Plan validated	10.Adequate verific. procedures	11.Adequate documentation	12. Dated and signed
2309	√	√	√	√	√	√	√	√	√	√	√	√
517	√	√	√	√	√	√	√	√	√	√	√	no
688	√	√	√	√	√	√	√	√	√	√	√	no
3085	√	√	√	√	√	√	√	√	√	√	√	√
195	√	√	√	√	√	√	√	√	√	√	√	√
297	√	√	no	√	√	no	√	√	√	√	√	√
533	√	√	√	√	√	√	√	√	√	√	√	√
572	√	√	√	√	√	√	√	√	√	√	√	√
640	√	√	√	√	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

217	√	√	√	√	√	√	√	√	√	√	√	√
790	√	√	√	√	√	no	√	no	√	√	√	√
180	√	√	√	√	√	√	√	√	√	√	√	√
1027	√	√	√	√	√	√	√	√	√	√	√	√
2291	√	√	√	√	√	√	√	√	√	√	√	√
101	√	√	√	√	√	√	√	√	√	√	√	√
004	√	√	√	√	√	√	√	√	√	√	√	√
239	√	√	√	√	√	√	no	√	√	√	√	√
1983	√	√	√	√	√	√	√	√	√	√	√	√
521	√	√	√	√	√	√	√	√	√	√	√	√
612	√	√	√	√	√	√	√	√	√	√	√	√
1614	√	√	√	√	√	√	√	√	√	√	√	√
952	√	√	√	√	√	√	√	√	√	√	√	√
039	√	√	√	√	√	√	√	√	√	√	√	√
015	√	√	√	√	√	√	no	√	√	√	√	√

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each establishment (except Est. 297, which was a processed product facility) was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is/are being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1.Written procedure	2. Sampler designated	3.Sampling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
2309	√	√	√	√	√	√	no	√	√	√
517	√	√	no	√	√	√	√	√	√	√
688	√	√	no	√	√	√	√	√	√	√
3085	√	√	no	√	√	√	√	√	√	√
195	√	√	√	√	√	√	√	√	√	√
297	not	applic	able							
533	√	√	no	√	√	√	no	√	√	√
572	√	√	no	√	no	√	√	√	√	√
640	√	√	no	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

217	√	√	√	√	√	√	no	√	√	√
790	√	√	no	√	√	√	no	√	√	√
180	√	√	no	√	√	√	√	√	√	√
1027	√	√	no	√	√	√	√	√	√	√
1614	√	√	√	√	√	√	√	√	√	√
2291	√	√	√	√	√	√	√	√	√	√
101	√	√	√	√	√	√	√	√	√	√
004	√	no	no	√	√	√	√	√	√	√
239	√	√	no	√	√	√	√	√	√	√
1983	not	applic	able							
521	√	√	no	√	√	√	√	√	√	√
612	√	√	no	√	√	√	√	√	√	√
952	√	√	√	√	√	√	√	√	√	√
039	not	applic	able							
015	√	√	no	√	√	√	√	√	√	√

Attachment D

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment (except est. 297 which was processed product establishment) was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	*1. Testing as required*	*2. Carcasses are sampled*	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
2309	√	√	N/A	no	√	√
517	√	√	N/A	√	√	√
688	√	√	N/A	no	√	√
3085	√	√	N/A	no	√	√
195	√	√	N/A	√	√	√
297	not	applicable				
533	√	√	N/A	√	√	√
572	√	√	N/A	√	√	√
640	√	√	N/A	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

217	√	√	N/A	√	√	√
790	√	√	N/A	no	√	√
180	√	√	N/A	√	√	√
1027	√	√	N/A	√	√	√
1614	√	√	N/A	√	√	√
2291	√	√	N/A	√	√	√
101	√	√	N/A	no	√	√
004	√	√	N/A	√	√	√
239	√	√	N/A	√	√	√
1983	not	applicable				
521	√	√	N/A	√	√	√
612	√	√	N/A	√	√	√
952	√	√	N/A	√	√	√
039	not	applicable				
015	√	√	N/A	√	√	√